

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

TAMMY COVINGTON and	)	
JEFFREY COVINGTON,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 19-cv-00718-PRW
	)	
CSAA FIRE AND CASUALTY	)	
INSURANCE, d/b/a AAA FIRE AND	)	
CASUALTY INSURANCE COMPANY,	)	
INC.,	)	
	)	
Defendant.	)	

**DEFENDANT’S FIRST SUPPLEMENTAL REQUESTED VOIR DIRE**

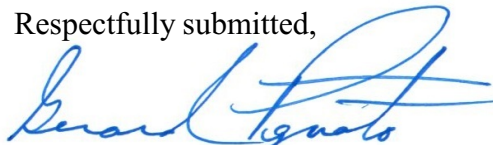
Defendant, CSAA Fire and Casualty Insurance Company (CSAA) submits the following First Supplemental Requested Voir Dire, in the above case. CSAA states that this Supplement is timely made as the deadline for Requested Voir Dire is August 24, 2020 (See [Doc 52].)

**SUPPLEMENTAL REQUESTED VOIR DIRE**

At the core of this lawsuit is a contract dispute. CSAA requests this court to interrogate the jury regarding their understanding of contracts. Most, if not all, of the prospective jurors will have had some experience during their lives contracting with another party. CSAA would like to explore their contracting experience and generally inquire regarding the purpose or function of a contract. Insurance policies are contracts, and coverage is subject to the terms, conditions, and exclusions contained therein.

Because, again, this lawsuit arises from a contract – *i.e.*, coverage – dispute, CSAA believes it is important to understand the jurors’ understanding of contracts and any backgrounds or experiences they may have in drafting, negotiating, or applying contracts.

Respectfully submitted,



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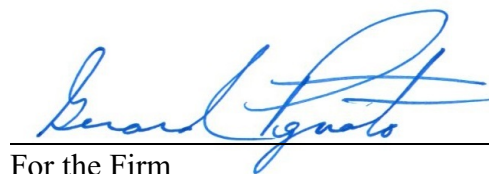
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ATTORNEYS FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

This is to certify that on August 24, 2020, a true and correct copy of the above and foregoing instrument was forwarded to:

Douglas J. Shelton, Esquire  
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ATTORNEYS FOR PLAINTIFFS

***VIA U.S. MAIL, FACSIMILE, AND EMAIL***



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For the Firm